UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-1(b) **SAUL EWING LLP** Turner N. Falk 1500 Market Street, 38th Floor Philadelphia, PA 19102 Telephone: (215) 972-7777 turner.falk@saul.com -and- Lucian B. Murley 1201 N. Market Street, Suite 2300 Wilmington, DE 19801 Telephone: (302) 421-6800 luke.murley@saul.com -and- **PORTER HEDGES LLP** Eric M. English (*pro hac vice* pending) James A. Keefe (*pro hac vice* pending) 1000 Main St., 36th Floor Houston, TX 77002 Tel: (713) 226-6000 Fax: (713) 226-6248 eenglish@porterhedges.com jkeefe@porterhedges.com *Counsel to Key Capture Energy, LLC*

In re:	Chapter 11
POWIN, LLC, *et al.*,[1]	Case No. 25-16137 (MBK)
Debtors.	(Jointly Administered)

APPLICATION FOR ADMISSION PRO HAC VICE

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[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; and (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

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Turner N. Falk, Esq. ("**Movant**"), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and an associate with Saul Ewing LLP, hereby moves the Court for an order permitting Eric M. English to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent interested party Key Capture Energy, LLC ("**KCE**") in the instant matter pursuant to Local Bankruptcy Rule 9010-1. In support of the relief requested herein, Movant states as follows:

JURISDICTION

This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. §157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

RELIEF REQUESTED

By this application, the Movant requests entry of an Order admitting *pro hac vice,* Eric M. English (the "**Applicant**"). The good standing of the Applicant is set forth in the Applicant's certification which is submitted herewith (the "**Certification**").

Applicant is a partner with Porter Hedges LLP, and maintains offices at 1000 Main St., 36th Floor, Houston, TX 77002. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted.

It is anticipated that Applicant will be active in the representation of KCE in this case. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of Eric M. English and that he be permitted to appear on KCE's behalf in connection with this case.

No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding.

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WAIVER OF MEMORANDUM OF LAW

Pursuant to Local Rule 9013-1, Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Dated: July 1, 2025   Respectfully submitted,

                                                       SAUL EWING LLP

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